

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

| | | |
|----------------------------------|---|---------------------|
| DOROTHY STANLEY, AS EXECUTRIX OF | : | |
| THE ESTATE OF HELEN A. RUNGE, | : | |
| Plaintiff | : | |
| | : | No. 05-10849-RGS |
| v. | : | (Judge Stearns) |
| | : | |
| WALTER J. KELLY, et al. | : | CIVIL ACTION |
| Defendants | : | JURY TRIAL DEMANDED |

**PLAINTIFF'S RESPONSE TO DEFENDANT KELLY'S OBJECTIONS
TO PLAINTIFF'S IDENTIFICATION OF DEPOSITIONS**

Plaintiff respectfully submits this Response to Defendant Kelly's Objections to Plaintiff's Identification of Depositions for use at trial and identifies the following portions of deposition transcripts for possible use at trial:

Walter J. Kelly

December 1, 2006

Page 14, Line 1 - Page 15, Line 1

Page 40, Line 5 - Page 41, Line 14

Page 48, Line 18 - Page 49, Line 9

Page 49, Line 17-Page 50, Line 15

Page 65, Lines 4-16

Page 75, Lines 2-21

Page 79, Line 10 - Page 80, Line 3

Page 80, Line 9 - Page 81, Line 12

Page 81, Line 14 - Page 82, Line 11

Page 82, Line 13-Page 86, Line 14

Page 93, Line 21-Page 94, Line 14

Page 96, Lines 5-10; 12-23

Page 100, Lines 5-14,

Page 100, Line 18 - Page 102, Line 11

Page 108, Lines 11-19; 21-25 - Page 109, Lines 1-2

Page 110, Lines 5 - 23

Page 111, Lines 2-15

Page 115, Line 10 - Page 119, Line 14

Page 130, Lines 11 - 13, 15 - 25

Page 131, Lines 1 - Page 132, Line 3

Page 138, Line 23 - Page 142, Line 6

Page 146, Lines 6-10

Page 152, Line 10 - Page 153, Line 22

Page 154, Line 4 - Page 155, Line 12

Page 156, Line 21 - Page 157, Line 4

Page 162, Line 22 - Page 163, Line 6

Page 163, Line 15 - Page 164, Line 8

Page 171, Line 3 - Page 172, Line 19

Page 186, Lines 13 - 23

Page 187, Line 14 - Page 188, Line 16

Page 211, Lines 2-10

Page 211, Lines 12-18, 20

Page 212, Line 8

Page 228, Lines 4-20

Page 240, Line 12 - Page 241, Line 24

Page 245, Lines 2, 7

Page 264, Line 1 - Page 265, Line 1

December 14, 2006

Page 17, Lines 1-13

Page 29, Line 18 - Page 30, Line 21

Page 32, Line 15 - Page 34, Line 16

Page 41, Line 1 - Page 42, Line 12

Page 50, Lines 22-24

Page 53, Lines 18-24

Page 70, Line 15 - Page 71, Line 19

Page 75, Line 15 - Page 76, Line 14

Page 79, Lines 5-16

Page 81 Line 18 - Page 82, Line 14

Sandra Porazzo Perry

Page 14, Lines 9-16

Page 22, Line 18 - Page 23, Line 20

Page 24, Lines 16 - Page 26, Line 11

Page 35, Line 8 - Page 38, Line 4

Respectfully submitted,

LATSHA DAVIS YOHE & MCKENNA, P.C.

Dated: June 18, 2008

By /s/ Glenn R. Davis
Glenn R. Davis
1700 Bent Creek Boulevard, Suite 140
Mechanicsburg, PA 17050
(717) 620-2424
gdavis@ldylaw.com
Pro Hac Vice

Blake J. Godbout, BBO #196380
BLAKE J. GODBOUT
& ASSOCIATES
33 Broad Street, 11th Floor
Boston, MA 02109
(617) 523-6677

Attorneys for Plaintiff, Dorothy Stanley,
Executrix of the Estate of Helen A. Runge

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing document was served upon the attorney of record for each party by electronic transmission.

Michele Carlucci
George S. Rockas
Wilson Elser Moskowitz Edelman & Dicker LLP
155 Federal Street
Boston, MA 02110
michele.carlucci@wilsonelser.com
george.rockas@wilsonelser.com

Michael Williams
Lawson & Weitzen, LLP
88 Black Falcon Avenue, Suite 145
Boston, MA 02210-1736
mwilliams@lawson-weitzen.com

Dated: June 18, 2008

By /s/ Glenn R. Davis
Glenn R. Davis